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9 UNITED STATES DISTRICT COURT  
10 DISTRICT OF NEVADA

11 United States,  
12  
13 Plaintiff,  
14 v.  
15 Louis Fahim Senegal,  
16 Defendant.

Case No. 2:19-cr-062-APG-DJA

**Stipulation to Set Joint Change  
of Plea and Sentencing Hearing  
and to Order Probation to  
Prepare a Presentence  
Investigation Report**

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19 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.  
20 Trutanich, United States Attorney, and Shaheen Torgoley, Assistant United  
21 States Attorney, counsel for the United States of America, and Rene L. Valladares,  
22 Federal Public Defender, and Raquel Lazo, Assistant Federal Public Defender,  
23 counsel for Louis Fahim Senegal, that this Court schedule a joint change of plea  
24 and sentencing hearing in seventy-five (75) days. Should this Court be inclined to  
25 set a joint hearing, the parties further request this Court order probation to  
26 prepare a presentence investigation report.

1 The Stipulation is entered for the following reasons:

2 1. Mr. Senegal has entered into a plea agreement with the government.  
3 The executed plea agreement has been forwarded to this Court's deputy clerk. The  
4 parties request that this court set the change of plea and sentencing on the same  
5 day. Considering the COVID-19 pandemic, this will alleviate the need for an  
6 additional hearing and expedite resolution of this case. This will also permit  
7 Mr. Senegal to take full advantage of requesting a credit for time served sentence  
8 (a benefit conferred by the plea agreement) without having to request an expedited  
9 sentencing hearing or wait the traditional 90 days from the date of the change of  
10 plea hearing. The parties request that this hearing be scheduled in 75 days to  
11 permit probation to prepare the presentence investigation report.

12 2. Probation has no objection and can complete the presentence  
13 investigation report 75 days from the date of Mr. Senegal's interview.<sup>1</sup> Probation  
14 however requires an order from this Court directing it to prepare the report.  
15 Accordingly, if this Court is inclined to conduct the two hearings on the same day,  
16 the parties request an order that the presentence investigation report be prepared.

17 3. The parties have contemporaneously filed a stipulation to continue  
18 the calendar call and trial dates in order to have the necessary time to set the  
19 hearing.  
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25 <sup>1</sup> Mr. Senegal had his presentence investigation interview with probation earlier  
26 this week.

1           4.     The defendant agrees with the request to have a joint plea and  
2 sentencing hearing. He further agrees to have both hearings proceed via  
3 videoconference whether held individually or jointly.<sup>2</sup>

4           DATED this 24<sup>th</sup> day of April, 2020.

5           RENE L. VALLADARES  
6           Federal Public Defender

          NICHOLAS A. TRUTANICH  
          United States Attorney

7           /s/ *Raquel Lazo*  
8           By \_\_\_\_\_

          /s/ *Shaheen Torgoley*  
          By \_\_\_\_\_

9           RAQUEL LAZO  
          Assistant Federal Public Defender

          SHAHEEN TORGLEY  
          Assistant United States Attorney

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26           <sup>2</sup> Defense counsel will provide this Court's deputy clerk with a written and signed  
waiver.

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA  
3

4 United States,

5 Plaintiff,

6 v.

7 Louis Fahim Senegal,

8 Defendant.  
9

Case No. 2:19-cr-062-APG-DJA

**ORDER**

10 Based on the Stipulation of counsel and good cause appearing,  
11 IT IS ORDERED that the change of plea and sentencing hearing is  
12 scheduled on July 7, 2020 at the hour of 10:00 a.m. in Courtroom 6C.  
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14 DATED this 24th day of April, 2020.

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16 UNITED STATES DISTRICT JUDGE  
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